

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-10493 GAO

MANUEL ROSA
Plaintiff,

v.

CITY OF BOSTON
Defendant,

**AFFIDAVIT OF PLAINTIFF MANUEL ROSA IN OPPOSITION
TO THE DEFENDANT CITY OF BOSTON'S MOTION FOR
SUMMARY JUDGMENT**

I, Manuel Rosa, under oath I state the following:

1. I am the plaintiff in the above action herein.
2. I have recently reviewed my answers to the interrogatories and my responses to questions asked of me during my deposition. My primary language is spanish, not english. I state this only for possible explanation and not for excuse with regard to the following.
3. My attorney has again specifically asked me what physical injuries I received as a result of my arrests. I told him again that I was not physically assaulted by the police during my arrests and therefore I was not physically harmed, except for perhaps the discomfort and minor pain of the handcuffs and being grabbed and pushed by the police during some of my arrests. The police officers never beat me up or hit me with their night sticks or anything like that.
4. My attorney explained to me that I may have suffered physical harm or injury after the arrest. He explained that some injuries take different forms such as loss of appetite or sleep disorders. I explained to him that I fear the police. That I have at times felt severe anxiety when I see a police car or a police officer on the street.

5. There have been times when I feel depressed because of what happened to me with the police. I feel depressed at times because I feel I have lost some of my self worth. Because I am thought of, or was thought of being a drug dealer, by my family, friends and co-workers at the time. This caused me nightmares for many years. I would dream that I would be arrested in the middle of the night. Sometimes I would awake with a cold sweat and real fear in my heart that I would spend more nights in jail. I do not have these dreams very often anymore.
6. I realize now that I did not answer the 'physical harm' question(s) in the way it was apparently asked of me.

Signed under the pains and penalties of perjury this 11th day, of April, 2006.

Manuel Rosa
Manuel Rosa